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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JAMIE PETTIT, et al.,

Plaintiffs,

v.

PROCTER & GAMBLE COMPANY,

Defendant.

Case No. 3:15-cv-2150 RS

**DECLARATION OF JONATHAN
SHAFFER AND POST-DISTRIBUTION
ACCOUNTING**

Judge: Hon. Richard Seeborg

1 I, Jonathan Shaffer, hereby declare as follows:

2 1. I am a Client Services Manager for Heffler Claims Group (“Heffler”) in
3 Philadelphia, Pennsylvania. I am over twenty-one years of age and am authorized to make this
4 declaration on behalf of Heffler and myself. The following statements are based on my personal
5 knowledge and information provided by other experienced Heffler employees working under my
6 supervision. This declaration and the post-distribution accounting reflected herein is being filed
7 in accordance with the Court’s Order Granting Final Approval of Class Action Settlement (*see*
8 Dkt. No. 135, ¶ 30) and this district’s Procedural Guidance for Class Action Settlements.

9 2. Heffler has extensive experience in class action matters, having provided services in
10 class action settlements involving antitrust, securities fraud, employment and labor, consumer,
11 and government enforcement matters. Heffler has provided notification and/or claims
12 administration services in more than 1,000 cases.

13 3. In the Court’s order granting preliminary approval, *see* Dkt. No. 117, Heffler was
14 appointed as the Claim Administrator to provide notification and administration services in
15 connection with a settlement of this action. Heffler’s duties leading up to and following Final
16 Approval of the settlement included: (a) filing a declaration in support of Final Approval; (b)
17 completing the validation of all claims submitted; (c) calculating payment amounts to eligible
18 claimants; (e) sending rejection letters to claimants who submitted deficient and/or invalid claims;
19 (f) printing and mailing distribution payments; and (g) performing such other tasks as counsel for
20 the Parties or the Court ordered Heffler to perform.

21 4. On March 14, 2019, Heffler submitted a declaration in support of Final Approval
22 that detailed the administrative services Heffler provided leading up to Final Approval. *See* Dkt.
23 No. 130-4.

24 5. As of June 28, 2019, which was the deadline for Heffler to pay valid claims, Heffler
25 had received 187,795 timely claims and 65 late claims. Of the 187,860 claims received, Heffler
26 determined 137,068 were valid and 50,792 were invalid. Claims could be found invalid for
27

various reasons, including (for example) if they exceeded the limits set forth in the settlement agreement or were for purchases in New York State, which are not covered by this settlement.

6. On May 24, 2019, Heffler sent rejection notices via email to the 50,015 claimants who provided an email address and submitted invalid claims.

7. Heffler has calculated the payment amount for each eligible claimant following the allocation guidelines in Section 4.4 of the Settlement Agreement.

8. On June 26, 2019, Heffler sent distribution payments to the 137,068 claimants who submitted valid claims. A copy of the payment letter is attached as **Exhibit A**.

9. There is no Gross Settlement Fund, because this is a claims-made settlement where P&G paid directly all valid claims, as well as the attorneys' fees and costs awarded by the Court along with the costs of settlement notice and administration.

10. The table below sets forth a post-distribution accounting.

Total Class Members	Approximately 3,884,000
Types of Notice	Publication; online and social media advertising; press releases
Notices mailed and not returned as undeliverable	N/A
Notice emailed and not returned as undeliverable	N/A
Opt-outs filed	58
Opt-outs as a percent of the Class	0.00149%
Objections filed	0
Objections as a percent of the Class	0%
Total (valid) Claim Forms submitted	187,860 (137,068)
Total (valid) claims received as a percent of the Class	4.84% (3.53%)
Administrative fees/costs	\$677,122.48 (Estimated)

POST-DISTRIBUTION ACCOUNTING

Class Counsel fees/cost	\$2,150,000.00 (as awarded by the Court)
Payment/distribution type	Checks
Number of payments	137,068
Total distributed	\$537,879.00
Average payment	\$3.92
Median payment	\$4.20
Smallest payment	\$0.60
Largest payment	\$30.00
Checks/payments not cleared	TBD
Amount of checks/payments not cleared	TBD
Cy pres recipient payment	N/A

I declare under penalty of perjury under the laws of the United States that the above is true and correct to the best of my knowledge. This declaration is executed on July 16, 2019 in Philadelphia, Pennsylvania.



Jonathan Shaffer

Exhibit A

Pettit v Procter & Gamble
c/o Claims Administrator
P.O. Box 58280
Philadelphia, PA 19102-8280

Check No: [REDACTED]
Check Amount: [REDACTED]
Check Date: 06/26/2019
Class Member ID: [REDACTED]

Class Member ID: [REDACTED]

[REDACTED]

Thank you for submitting a claim in connection with the Court-approved settlement in *Pettit v. Procter & Gamble Company, Case No. 3:15-cv-2150-RS* in the United States District Court for the Northern District of California. The attached check represents the full and final settlement payment to you as an eligible member of the Settlement Class and is based on the claim you submitted.

Please be advised that you have until September 24, 2019 to deposit the check. After that date, your check shall be deemed void and you will not be entitled to receive any payment under the settlement.

You should consult with your tax advisor to determine the tax consequences, if any, of this settlement payment to you.

All inquiries and address changes should be in writing, reference your name, check number or Class Member ID, and be forwarded to Pettit v. Procter & Gamble c/o Claims Administrator, P.O. Box 58280, Philadelphia, PA, 19102-8280.

Pettit v Procter & Gamble
c/o Claims Administrator
P.O. Box 58280
Philadelphia, PA 19102-8280

CHECK NO. [REDACTED]

DATE: 06/26/2019

AMOUNT: [REDACTED]

PAY: [REDACTED]

PAY
TO THE
ORDER
OF:

CASH PROMPTLY, NON-NEGOTIABLE AFTER
September 24, 2019

[REDACTED]
AUTHORIZED SIGNATURE